

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

Case No. 22-cv-02435 (LLS)(SN)

**JOINT STIPULATION ON
AUTHENTICITY OF EVIDENCE**

To this honorable Court, all parties, and their attorneys of record,

PLEASE TAKE NOTICE THAT Plaintiff, Lynne Freeman, and Defendants Tracy Deebbs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, Universal City Studios LLC, Emily Sylvan Kim, and Prospect Agency, LLC (collectively “Defendants”) hereby jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. KIM00351461—KIM00351464 , and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Emily Kim and her assistant at that time, Ellen Brescia.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. WOLFF0097494—WOLFF0097499 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Emily Kim and Tracy Wolff.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. KIM00347988—KIM00349138 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Emily Kim and Tracy Wolff.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. WOLFF0095644—WOLFF0095653 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Emily Kim and Tracy Wolff.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. ENTANGLED0074452—ENTANGLED0074464 and confirm that the

evidence at these Bates Nos. are true and correct copies of text conversations between and among Elizabeth Pelletier, Tracy Wolff, and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. KIM00351667—KIM00351687 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Elizabeth Pelletier and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. ENTANGLED0073726—ENTANGLED0073734 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Elizabeth Pelletier and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. KIM00352321—KIM00352455 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Stacy Abrams and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. WOLFF0095644—WOLFF0095653 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Tracy Wolff and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. ENTANGLED0073444—ENTANGLED0073470 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Elizabeth Pelletier and Emily Kim.

The Parties further jointly stipulate as to the authenticity of evidence produced by Defendants at Bates Nos. ENTANGLED0074207—ENTANGLED0074219 and confirm that the evidence at these Bates Nos. are true and correct copies of text conversations between and among Elizabeth Pelletier and Emily Kim.

Dated: November 22, 2023
New York, New York

Respectfully submitted,

By: /s/ Stephen M. Doniger
Scott Alan Burroughs, Esq.
Stephen M. Doniger, Esq.
DONIGER / BURROUGHS
247 Water Street, First Floor
New York, New York 10038
(310) 590-1820
stephen@donigerlawfirm.com
scott@donigerlawfirm.com
Attorneys for Plaintiff

By: /s/ Benjamin H. Halperin
Nancy E. Wolff
Benjamin H. Halperin
CeCe M. Cole
41 Madison Avenue, 38th Floor
New York, New York 10010
Tel: (212) 974-7474
nwolff@cdas.com
bhalperin@cdas.com
ccole@cdas.com
*Attorneys for Defendants Tracy
Deebs-Elkenaney
p/k/a Tracy Wolff, Entangled
Publishing, LLC, Holtzbrinck
Publishers, LLC d/b/a Macmillan,
and Universal City Studios LLC*

By: /s/ Lance H. Koonce
Lacy H. Koonce, III
KLARIS LAW PLLC
29 Little West 12th Street

New York, NY 10014
Phone: (917) 612-5861
lance.koonce@klarislaw.com
*Attorneys for Defendants Emily
Sylvan Kim and Prospect Agency,
LLC*